

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JASON B. HAMILTON	:	
CHRISTINE MARIE HAMILTON	:	CASE NO. 1:19-bk-03853
Debtors	:	
	:	
NATIONSTAR MORTGAGE, LLC	:	
d/b/a/ Mr. Cooper,	:	
Movant	:	
	:	
v.	:	
	:	
JASON B. HAMILTON	:	
CHRISTINE MARIE HAMILTON,	:	
Respondents	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted that Movant is the holder of a secured claim. Proof that the mortgage is secured only by a first mortgage on the property is demanded at trial and this averment is therefore denied..
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions. Denied that Movant is entitled to relief.
6. Admitted.
7. Admitted.
8. Proof of default is demanded at trial and this paragraph is therefore denied. Debtors made the mortgage payments for October and November, 2019.
9. Denied. Debtors made the mortgage payments for October and November, 2019.

10. Admitted.
11. Proof that Movant will suffer irreparable harm is demanded at trial and this paragraph is therefore denied.
12. Denied that Rule 4001(a)(3) should not be applicable and denied that the Movant should be allowed to immediately enforce and implement the Order granting relief from the automatic stay.
13. Admitted.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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